

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

AMERICAN ASSOCIATION OF PEOPLE )  
WITH DISABILITIES, FEDERATION OF )  
WOMEN'S CLUBS OVERSEAS, INC., NEW )  
MEXICO PUBLIC INTEREST RESEARCH )  
GROUP EDUCATION FUND, and )  
SOUTHWEST ORGANIZING PROJECT, )  
Plaintiffs, ) No. CV 08-702 JOB/WDS  
v. )  
MARY HERRERA, in her capacity as Secretary )  
of State, )  
Defendant. )  
X

**PLAINTIFFS' APPLICATION FOR A PRELIMINARY INJUNCTION**

Plaintiffs, through undersigned counsel, move this Court pursuant to Federal Rule of Civil Procedure 65 for a preliminary injunction preventing the Defendant from enforcing the New Mexico law regulating voter-registration efforts, NMSA 1978, § 1-4-49, the administrative regulations implementing this legislation, 1.10.25.7-10 NMAC, and other de facto requirements that New Mexico officials have put in place with respect to voter registration.

In support of this Application, Plaintiffs submit the accompanying (i) Memorandum of Points and Authorities and (ii) Declaration of Neal A. Potischman.

Plaintiffs respectfully request oral argument on this Application.

Dated: Albuquerque, New Mexico  
August 11, 2008

Respectfully Submitted,

FREEDMAN BOYD HOLLANDER GOLDBERG &  
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By: /s/ John W. Boyd

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**CERTIFICATE OF SERVICE**

I certify that on the 11th day of August, 2008, I filed electronically through the CM/ECF system the foregoing Application, along with the supporting (i) Memorandum of Points and Authorities and (ii) Declaration of Neal A. Potischman, which caused the following counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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